

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA

\*

v.

\*

MAG. NO. M-25-0310-M

JINYI ZHENG

\*

UNOPPOSED MOTION FOR CONTINUANCE OF PRELIMINARY HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Assistant Federal Public Defender, BRIAN D. BUEHLER, and files this Unopposed Motion for Continuance of Preliminary Hearing on behalf of the defendant, JINYI ZHENG, and respectfully requests this Honorable Court to continue her Preliminary Hearing set for February 20, 2025 at 2:00 p.m., for the following reason:

I.

Ms. JINYI ZHENG was arrested on or about February 12, 2025. Defense Counsel is needing additional time to research the statute and case law. Therefore, a continuance of five days is requested. This motion is not sought for delay, but so that at justice may be done. It should be appropriate to go forward with the detention hearing on February 20, 2025.

II.

Assistant United States Attorney, Alexa Parcell was consulted and is unopposed to this motion.

WHEREFORE, PREMISES CONSIDERED, defendant prays that this Honorable Court grant her Unopposed Motion for Continuance and the Preliminary Hearing to be continued for five days.

Respectfully submitted,

PHILIP G. GALLAGHER  
Federal Public Defender  
Southern District of Texas No. 566458  
New Jersey State Bar No. 2320341

By /s/ Brian D. Buehler  
BRIAN D. BUEHLER  
Assistant Federal Public Defender  
Attorney-in-Charge  
New York State Bar No. 4893665  
Southern District of Texas No. 3277196  
1701 W. Business Hwy. 83, Suite 405  
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CERTIFICATE OF CONFERENCE

I, BRIAN D. BUEHLER, certify that I have conferred with all other parties who are listed below about the merits of this Unopposed Motion with the following results: Assistant United States Attorney, Alexa Parcell was consulted and does not oppose the relief sought in this continuance.

/s/ Brian D. Buehler  
BRIAN D. BUEHLER  
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I, Brian D. Buehler, certify that on the 19th day of February, 2025, a copy of the foregoing Motion for Continuance of Preliminary and Detention Hearing was served by notification of electronic filing to the office of Assistant United States Attorney, Alexa Parcell.

/s/ Brian D. Buehler

BRIAN D. BUEHLER

Assistant Federal Public Defender